



Michael D. Maves, MD, MBA, Executive Vice President, CEO

November 13, 2007

Deputy Assistant Administrator
Office of Diversion Control
Drug Enforcement Administration
Washington, DC 20537
Attn: DEA Federal Register Representative/ODL

Re: Changes to Patient Limitation for Dispensing or Prescribing Approved Narcotic Controlled Substances for Maintenance or Detoxification Treatment by Qualified Individual Practitioners [Docket No. DEA-275]

The American Medical Association (AMA) is pleased to offer comments to the Drug Enforcement Administration (DEA) on proposed regulations affecting the dispensing or prescribing of certain narcotic drugs used in maintenance and detoxification treatment. The AMA commends the DEA for proposing changes which will help to promote a public health approach to managing patients who suffer from addictive disorders.

The AMA strongly supports the need to increase the number of patients who may receive prescribed drug addiction treatments. The previous requirement limiting the number of patients who could receive maintenance or detoxification treatment through a group practice to 30 was a barrier to treatment access. Increasing the limit from 30 patients for each group practice to 30 patients for each qualified practitioner, whether working individually or in a group practice, will assist in improving access to qualified treatments.

Additionally, the proposal to permit certain qualifying physicians to treat up to 100 patients at any one time should further alleviate substantial concerns about access to treatment for individuals in need of opioid maintenance or detoxification therapy. The AMA believes that the requirement for such practitioners to submit a supplemental notification to the Secretary of their need and intent to treat up to 100 patients, not sooner than one year after initially qualifying as a treating physician, is a reasonable compromise at this time.

Thank you for the opportunity to comment on this proposal.

Sincerely,

A handwritten signature in black ink that reads "Mike Maves". The signature is written in a cursive, flowing style.

Michael D. Maves, MD, MBA